

**Christopher Lundberg**, OSB No. 941084  
(pro hac vice)

Email: [clundberg@hk-law.com](mailto:clundberg@hk-law.com)

**Joshua J. Stellmon**, OSB No. 075183  
(pro hac vice)

Email: [jstellmon@hk-law.com](mailto:jstellmon@hk-law.com)

**Christopher T. Griffith**, OSB No. 154664  
(pro hac vice)

Email: [cgriffith@hk-law.com](mailto:cgriffith@hk-law.com)

**HAGLUND KELLEY LLP**

2177 SW Broadway  
Portland, Oregon 97201

Phone: (503) 225-0777

Facsimile: (503) 225-1257

Attorneys for Plaintiff

IN THE UNITED STATES DISTRICT COURT

DISTRICT OF ALASKA

**METLAKATLA INDIAN  
COMMUNITY**, a Federally Recognized  
Indian Tribe,

Plaintiff,

v.

**MICHAEL J. DUNLEAVY**, Governor of  
the State of Alaska, **DOUG VINCENT-  
LANG**, Commissioner of the Alaska  
Department of Fish and Game, and  
**JAMES E. COCKRELL**, Commissioner  
of the Alaska Department of Public Safety

Defendants.

Case No.: 5:20-cv-00008-SLG

**PARTIES' JOINT MOTION TO  
EXTEND TIME TO EXCHANGE  
EXPERT WITNESS DISCLOSURES**

The Parties jointly move, pursuant to Federal Rule of Civil Procedure 6(b), for an order extending the deadline for the exchange of expert witness disclosures. In support of this motion, the Parties state as follows:

1. Pursuant to the current scheduling order [ECF No. 82], the deadline for the exchange of expert witness disclosures is set for January 17, 2025.

2. The Parties require additional time to finalize expert witness retention and preparation of the required disclosures. The additional time is necessary to ensure complete and accurate submissions.

3. The Parties have conferred and mutually agree to a brief extension of the deadline to January 31, 2025. This extension will not affect any other deadlines in the case or the trial date.

4. This request is made in good faith and not for the purposes of delay.  
Neither party will be prejudiced by the requested extension.

WHEREFORE, the Parties respectfully request that this Court grant their Joint Motion and extend the deadline for the exchange of expert witness disclosures to January 31, 2025, and for any other relief this Court deems appropriate.

DATED this 7<sup>th</sup> day of January 2025.

By: /s/ Christopher Lundberg  
Christopher Lundberg, OSB No. 941084  
(pro hac vice)  
Email: [clundberg@hk-law.com](mailto:clundberg@hk-law.com)  
Joshua J. Stellmon, OSB No. 075183  
(pro hac vice)  
Email: [jstellmon@hk-law.com](mailto:jstellmon@hk-law.com)  
Christopher T. Griffith, OSB No. 154664  
(pro hac vice)  
Email: [cgriffith@hk-law.com](mailto:cgriffith@hk-law.com)  
Haglund Kelley LLP  
2177 SW Broadway  
Portland, OR 97201  
(503) 225-0777  
*Attorneys for Plaintiff*

**PAGE 2 – PARTIES’ JOINT MOTION TO EXTEND TIME  
TO EXCHANGE EXPERT WITNESS DISCLOSURES**

By: /s/ Christopher Orman  
Christopher F. Orman, Alaska Bar No.  
1011099  
Email: [christopher.orman@alaska.gov](mailto:christopher.orman@alaska.gov)  
Alaska Department of Law  
123 4<sup>th</sup> Street, Suite 600  
Juneau, AK 99801  
(907) 465-4136

*Attorney for Defendant*

HAGLUND KELLEY LLP  
2177 SW Broadway  
Portland, OR 97201  
T: (503) 225-0777 / F: (503) 225-1257

## CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the **PARTIES' JOINT MOTION TO EXTEND TIME TO EXCHANGE EXPERT WITNESS DISCLOSURES** was filed with the Clerk of the Court for the United States District Court – District of Alaska by using the CM/ECF system. Participants in Case No.: 5:20-cv-00008-SLG who are registered CM/ECF users will be served by the CM/ECF system.

DATED January 7, 2025.

### HAGLUND KELLEY LLP

By: /s/ Christopher Lundberg  
Christopher Lundberg, OSB No. 941084  
(pro hac vice)  
Email: [clundberg@hk-law.com](mailto:clundberg@hk-law.com)  
Joshua J. Stellmon, OSB No. 075183  
(pro hac vice)  
Email: [jstellmon@hk-law.com](mailto:jstellmon@hk-law.com)  
Christopher T. Griffith, OSB No. 154664  
(pro hac vice)  
Email: [cgriffith@hk-law.com](mailto:cgriffith@hk-law.com).  
2177 SW Broadway  
Portland, OR 97201  
(503) 225-0777

*Attorneys for Plaintiff*